

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

THE RESEARCH FOUNDATION FOR THE  
STATE UNIVERSITY OF NEW YORK,  
UNIVERSITY OF CONNECTICUT, and  
WORCESTER POLYTECHNIC INSTITUTE,

*Plaintiffs,*

v.

SAMSUNG ELECTRONICS CO., LTD.;  
SAMSUNG ELECTRONICS AMERICA, INC., and  
SAMSUNG SEMICONDUCTOR, INC.,

*Defendants.*

Case No.: 2:23-CV-00141-RWS-RSP

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS  
RELATED TO MOTIONS FOR SUMMARY JUDGMENT**

Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. (collectively, “Defendants”) file this Unopposed Motion for Leave to Exceed Page Limits Related to Motions for Summary Judgment and would show the Court as follows:

On March 17, 2025, Defendants filed their Motion for Partial Summary Judgment of Non-Infringement (“Non-Infringement MSJ”) (Dkt. No. 197) and Motion for Partial Summary Judgment that the Asserted Claims of U.S. Patent No. 9,872,652 Are Patent Ineligible (“Patent Ineligible MSJ”) (Dkt. No. 198). Defendants’ Non-Infringement MSJ was twenty-two pages. Defendants’ Patent Ineligible MSJ was seventeen pages. Each of the above-referenced motions address important issues that, though not case dispositive, are dispositive as to the patents addressed in the motions. Defendants respectfully seek the Court’s leave to exceed the Court’s fifteen-page limit for non-dispositive motions. Specifically, Defendants request an additional

seven pages for their Non-Infringement MSJ and an additional two pages for their Patent Ineligible MSJ. Defendants also request a reciprocal extension for Plaintiffs The Research Foundation for the State University of New York's, University of Connecticut's, and Worcester Polytechnic Institute's ("Plaintiffs") Response in Opposition to Defendants' Non-Infringement MSJ and Patent Ineligibility MSJ.

Defendants represent that good cause exists to grant leave for Defendants and Plaintiffs to exceed the page limits relating to non-dispositive motions. Due to the complex nature of the issues and law related to Defendants' Non-Infringement MSJ and Patent Ineligibility MSJ, the additional pages are necessary in order to adequately explain the issues.

Counsel for Defendants met and conferred with counsel for Plaintiffs to discuss the substantive relief sought in this Motion, and counsel for Plaintiffs indicated that Plaintiffs are unopposed to the relief sought in this Motion.

Accordingly, Defendants respectfully request that the Court grant this Unopposed Motion and enter an order granting (1) Defendants leave to exceed the Court's fifteen-page limit for non-dispositive motions with respect to Defendants' Non-Infringement MSJ and Patent Ineligibility MSJ and (2) Plaintiffs leave to exceed the Court's fifteen-page limit for their Responses in Opposition to Defendants' Non-Infringement MSJ and Patent Ineligibility MSJ.

Dated: March 24, 2025

Respectfully submitted,

*/s/ Melissa R. Smith*

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*Attorneys for Defendants  
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America, Inc., and Samsung Semiconductor, Inc.*

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Defendants met and conferred with counsel for Plaintiffs to discuss the substantive relief sought in this Motion pursuant to Local Rule CV-7(h). Counsel for Plaintiffs indicated that Plaintiffs are unopposed to the relief sought in this Motion.

*/s/ Melissa R. Smith*

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Melissa R. Smith

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV- 5(a)(3) on March 24, 2025.

*/s/ Melissa R. Smith*

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Melissa R. Smith